



**LOS ANGELES COUNTY SHERIFF'S
DEPARTMENT COMPLIANCE WITH
TRANSPARENCY LAW**

AUGUST 2019

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INTRODUCTION

County Code section 6.44.190(j) provides that “[t]he Sheriff’s Department and all other County departments shall cooperate with the OIG and promptly supply any information or records requested by the Office of Inspector General, including confidential peace officer personnel records [. . .].” To facilitate transparency of government operations, County Code section 6.44.190 requires the Inspector General to report publicly on Los Angeles County Sheriff’s Department operations. As set forth below, under the current administration, the LASD has repeatedly declined to supply information and records requested. This change in practice has dramatically limited transparency.

In some instances, the Sheriff has cited for his refusal to cooperate an agreement between former Sheriff Jim McDonnell and the Inspector General which paved the way for full cooperation by the previous administration. That agreement, made a condition at the time by LASD for compliance with Government Code section 25303 and County Code section 6.44.190, permitted Sheriff McDonnell to restrict access in limited and specific instances. By November of 2018, LASD had ceased invoking the agreement and provided relatively full access. When Sheriff Villanueva took office he did not seek a similar agreement with the Office of Inspector General. A letter from the Inspector General to the Sheriff regarding access and cooperation went unanswered.

Subsequently, Sheriff Villanueva cited the agreement as a justification for restricting computer access by the Office of Inspector General. However, the agreement specifically provides for a variety of kinds of access which the Sheriff has denied, including attendance at meetings, access to personnel records, and documents provided within ten days of request absent explanation. The Sheriff has completely ignored those parts of the agreement and used it only as a justification for reducing transparency.

This failure to comply with laws designed to overcome secrecy in government is mirrored in the LASD’s systematic refusal to comply with California Public Records Act requests in a timely manner. While the Sheriff has a large number of staff members assigned to the Sheriff’s Information Bureau, he claims to be unable to comply with modifications to Penal Code section 832.7 which permit the public access to records regarding shootings, use of force, and findings of dishonesty. In the case of Caren Mandoyan, for instance, the Sheriff refused to provide the public with the details of a deputy first found to have been dishonest and fired and subsequently brought back by the current administration. The public received critical information through a California Public Records Act request to the Civil Service Commission which had upheld the firing and is not under the Sheriff’s control.* The Office of Inspector General was only able to lawfully report on the Mandoyan matter because of these PRA requests which the Sheriff could not deny. Numerous public requests to LASD are currently going completely unanswered.

* This sentence originally read “The public received critical information only through a California Public Records Act request to the Civil Service Commission which had upheld the firing and is not under the Sheriff’s control.” The Office of Inspector General has learned from sources other than the Department that the Department did provide the Los Angeles Times with information pursuant to a PRA after the Times had received the information from the Civil Service Commission.

DIRECTIVES TO LIMIT ACCESS

In early February of 2019, what used to be routine requests by Office of Inspector General staff for information which had historically yielded immediate responses from Department members were being met with answers such as, "Things have changed. I'll have to talk to my Captain." Upon inquiry we were informed that a directive had been issued by the Department's Chief of Staff that all requests from outside entities, including requests from the Office of Inspector General and court appointed monitors, were to be forwarded to the Sheriff's office, and from there would be forwarded to the appropriate person within the Department for a response. We have been told that due to intervention, primarily of Assistant Sheriff Bob Olmstead, the Custody Division was excepted from this direction.

Other than our secondhand receipt of this directive, the Office of Inspector General was not consulted about, given notice of or provided a copy of this directive. In an effort to determine the nature of the directive and the issues which gave rise to it, Office of Inspector General staff met with LASD Executive Officer Ray Leyva and requested a copy of this directive. The Executive Officer said only "I haven't seen it."

This directive has caused delays in the flow of information from the Department to the Office of Inspector General, but has not stopped it completely. The Department's line staff continue to be extremely cooperative with the Office of Inspector General while at the same time attempting to comply with the Department's new directive.

On June 10, 2019, we sent a request to the Department for "the contents of all correspondence by and between department executives and managers (i.e. rank of captain and above), in whatever form (i.e. email, unit order, directive, bulletin, et al.), which occurred on or after December 3, 2018, and which contains direction or instruction regarding providing department information to the Office of Inspector General." This was in response to the issues we had been facing and an email we were told had been sent by Undersheriff Murakami to the Department's command staff, the subject of which was "OIG Access/Investigations" and in which he directed that all requests for "investigations" be directed to the Sheriff's office and the Chief of Professional Standards.

The Office of Inspector General received no response to this request. The Department has not provided the Office of Inspector General with a copy of the Chief of Staff's directive, the email sent to Department staff by Undersheriff Murakami , or any other email, unit order, directive, bulletin or communication it has issued regarding Office of Inspector General access. As described below, the Department has blocked access by the Office of Inspector General to information in a manner which has compromised the Office of Inspector General's ability to monitor the Department's operations in subject areas which significantly impact the Department's policing of the communities it serves.

ACCESS BY THE INSPECTOR GENERAL TO INVESTIGATIONS HAS BEEN DENIED OR RESTRICTED

THE DEPARTMENT HAS DECLINED TO PROVIDE INFORMATION TO THE OFFICE OF INSPECTOR GENERAL REGARDING DEPARTMENT INTERACTIONS WITH CIVILIANS

On June 5, 2019, the Inspector General learned of a traffic stop by the Sheriff's Department of a local elected official. The incident appeared to demonstrate potential similarities to the procedures used by the [Santa Clara Valley Domestic Highway Enforcement Team](#), which has been discontinued due to constitutional violations, potentially indicating that LASD was training the same practices department-wide. The Inspector General requested that the Department provide a copy of the documentation of the recent stop. The Department refused that request. On June 17, the Inspector General, in a face-to-face meeting with the Sheriff, asked that the information regarding the traffic stop be provided. The Sheriff refused, stating the information would be provided only when the investigation was completed. After intervention by then-Chief of Staff Del Mese, an agreement was reached that the Department would provide the Office of Inspector General the information after the investigation was complete, which was predicted to require no more than three weeks. It should be noted that the agreement between the Inspector General and the previous sheriff specifically provided that the Office of Inspector General would be permitted to monitor in-progress investigations. The Sheriff has since removed his chief of staff and provided no documentation to the Inspector General.

THE DEPARTMENT HAS DECLINED TO MAKE AVAILABLE TO THE OFFICE OF INSPECTOR GENERAL PERFORMANCE RECORDING AND MONITORING SYSTEM RECORDS REGARDING SECRET INVESTIGATIONS

In late 2018, Office of Inspector General staff noted that cases which had formerly appeared in the Performance Recording and Monitoring System (PRMS)ⁱ were no longer visible in PRMS, did not appear in PRMS reports, and were not included in statistics compiled from PRMS. We reported what we thought was an anomaly to the Department and were advised that there is a feature in PRMS that permits the Department to make PRMS records "IAB-private," that is, invisible to almost all users other than the Captain of Internal Affairs Bureau and the captain's chain of command.

The reasons for making these cases private are not necessarily nefarious. For example, during the pendency of the election, Sheriff McDonnell ordered that closed disciplinary files regarding his political opponent, Alex Villanueva, be made private. This was done to avoid the risk that these files would be misused during the election. However, the concealing of these files made statistical information provided to the Office of Inspector General through PRMS false. Further, concealing these files precluded monitoring of particularly sensitive cases, including the type that resulted in Sheriff Baca and Undersheriff Tanaka being convicted in federal court.

On October 31, 2018, the Inspector General sent a letter to then Sheriff Jim McDonnell asking that the Office of Inspector General be included among the users who had access to these files. The Office of Inspector General also requested through our routine protocols that the Chief of the Professional Standards Division provide us with the case files of these cases which had been made private to IAB.

Sheriff McDonnell did not initially respond to our request that the Office of Inspector General be designated as a user with access to IAB-private files. However, after a personal request from the Inspector General to Sheriff McDonnell in November of 2018, the then-Sheriff directed that we be provided copies of case files which had been designated as IAB-private, which included files relating to the current Sheriff. The Office of Inspector General has retained those files, in part in order to verify whether any alterations are made such as those allegedly requested of Chief Alicia Ault by the incoming administration.

In the course of preparing subsequent report-backs on LASD internal administrative investigations and dispositions of disciplinary actions under the new administration, Office of Inspector General staff again noticed apparent anomalies in data. For example, when querying in March the number of administrative investigations which met the specified criterion in an earlier month, PRMS would yield a different number than that which PRMS yielded when the same report with the same criterion had been run in February.

We requested that the Department provide us with the case summary report for the cases which had been made private to the Internal Affairs Bureau. A PRMS case summary report generally includes the subject employee's name, the case number, a brief description of the allegations and, where applicable, the findings and the disposition of the case. The Department did not respond to this request.

Without access to these concealed case files we are unable to ascertain or confidently report precisely accurate information regarding the Department's handling of discipline cases. Because of this the reports we have issued in response to the Board's March 12, 2019, motion may or may not be accurate.

In the past, such secrecy has given us jail abuse, secret societies, some of which have engaged in violent acts and stratified themselves based on race and gender, and misconduct at the highest levels of the Department, resulting in federal prosecutions and convictions. It is not possible to conclude the current administration's increase in secrecy is not repeating these mistakes.

THE DEPARTMENT HAS DECLINED TO ADVISE THE OFFICE OF INSPECTOR GENERAL OF THE DEPARTMENT'S RE-EVALUATIONS OF DISCIPLINARY OUTCOMES

On December 4, 2018, the Inspector General requested that the Department advise the Inspector General of the proposed "Truth and Reconciliation" committee's members and provide the Inspector General advance notice of the committee's meetings so that the Office of Inspector General could monitor the process and report on it. As is documented in our report, *Initial Implementation by the Los Angeles County Sheriff's Department of the Truth and Reconciliation Process*,ⁱⁱ the Department ignored the Inspector General's request and proceeded with the process without notice of the meetings or the outcomes. The Office of Inspector General learned, as most did, of the Department's reinstatement of Caren Mandoyan, through the media.

On January 29, 2019, the Sheriff appeared before the Board of Supervisors and said that there were half a dozen instances in which employees had been wrongfully terminated and that these cases were "low hanging fruit." The Office of Inspector General requested on February 13, 2019, that the Sheriff provide the Office of Inspector General with the names of those individuals and the names of any other persons whose cases were under review. The Sheriff did not respond to that letter, nor did the Department provide that information to the Office of Inspector General.

The Sheriff again appeared before the Board of Supervisors on March 12, 2019, and the supervisors asked whether additional deputies had been reinstated and whether the Department has also been bringing back people that had pending civil service cases or who had not finished going through the process itself. The Sheriff answered that there had only been the one [Mandoyan] and that the Department had put everything on hold until a process was developed.

The Office of Inspector General's review of Department records has found that, in fact, prior to that board meeting, the Department had reinstated two employees, one on February 19, 2019, and another on February 20, 2019, pursuant to settlement agreements negotiated by the Department (three others had also been reinstated since Mandoyan, but pursuant to rulings by the Civil Service Commission). The Sheriff did not include the Office of Inspector General in the process used to bring these employees back or notify us that the process was underway or had been completed.

On March 12, 2019, the Sheriff also told the Board of Supervisors that the Office of Inspector General would have a "front row seat" to the process of re-evaluating these disciplinary cases. We have also requested that the Department provide us with settlement agreements it enters into. However, the Office of Inspector General has learned that since the March 12, 2019, board meeting, the Department has entered into settlement agreements and reinstated or attempted to reinstate four or more additional employees, some who, like Mandoyan, had been terminated for dishonesty or for making false statements to investigators. The Office of Inspector General was not provided with the settlement agreements for any of these employees. Because we do not have access to the "IAB-private" cases we cannot be certain there are only these four.

As in all of the earlier cases, the Department did not notify the Office of Inspector General that these cases were being evaluated, did not invite the Office of Inspector General to be present and monitor the process and did not notify the Office of Inspector General that the Department had decided to reinstate these employees. Because the process was held in secret, or not held at all, we are unable to report on why these employees were reinstated. Abandoning important safeguards increases the chances that allegations of misconduct will be covered up when the suspect is held in high regard by the Sheriff and unfairly pursued when they are not, precisely the wrong the current Sheriff claimed he sought office to prevent.

THE DEPARTMENT HAS CURTAILED OFFICE OF INSPECTOR GENERAL ACCESS TO PRMS

As described above, our efforts to monitor the Department's disciplinary process rely in large part on access to PRMS. This reliance has grown greater since the Department is not providing us information for which we have asked. However, recently the Department severely curtailed Office of Inspector General access to PRMS.

As the business requirements of the Office of Inspector General and the Department changed and our relationship evolved over the past several years, so too did the methods the Department employed to provide us information. In order to comply with County Code section 6.44.190(J) the Department placed five terminals in the Office of Inspector General through which we had access to the intranet, custody databases, grievance data bases and other systems, including PRMS.

On Monday, June 10, 2019, without consultation or notice, the Department turned off access from within our offices to PRMS and subsequently reinstated the procedure outlined in the original agreement with Sheriff McDonnell, the *Memorandum of Agreement to Share and Protect Confidential LASD Information* of December 15, 2015. The Department has restricted Office of Inspector General staff to one terminal, located in the City of Commerce, and permits the Office of Inspector General access to that terminal only Monday through Thursday (and sometimes Friday) during business hours while a Department employee is able to sit and observe our staff member and monitor and log what our staff member is doing.

On Monday, July 15, 2019, without consultation or notice, the Department informed our Office of Inspector General staff member who was at the City of Commerce that the Office of Inspector General would no longer be permitted to create and copy PRMS generated reports regarding internal administrative investigations which are still active. The Department told our staff member that we could only display these reports on screen and hand write what we saw.

The Office of Inspector General was not consulted about either of these decisions or warned of these decisions in advance. When asked about the return to the City of Commerce, the Department has only said that it is because that is what the MOA provides for. The Inspector General met personally with Sheriff Villanueva to request the reactivation of our five terminals on June 17th. The Sheriff took the opportunity to complain that the pending report on the “Truth and Reconciliation” panel prepared by Office of Inspector General staff was biased and to tell the Inspector General that if the report was released there would be consequences. Computer access was not restored.

THE DEPARTMENT HAS DECLINED TO ADVISE THE OFFICE OF INSPECTOR GENERAL OF CHANGES IN POLICIES, PROCEDURES AND PRACTICES

Despite our repeated requests pursuant to County Code section 6.44.190(J), the current LASD administration has generally excluded the Office of Inspector General from monitoring the proposal, deliberations and implementation of changes in Department policies, procedures and practices. These proposals have included changes to policies, procedures and practices which directly impact the Department’s ability to address issues identified by the Citizens’ Commission on Jail Violence as contributing to the culture which led to jail violence.

On December 4, 2018, the Inspector General requested that the Sheriff provide the Office of Inspector General the text of proposed changes, additions or deletions to Department policies, practices or procedures at the time such proposals are submitted to his approval process and provide approved policy, practice and procedure changes, additions and deletions at the time those changes are communicated to his command staff. The Department did not respond to this request.

On January 9, 2019, a representative of the Office of Inspector General was present at the LASD Executive Planning Council, which is comprised of the Sheriff, the Undersheriff, the assistant sheriffs and division chiefs and commanders. A commander in the Professional Standards and Training Division told the council that approximately fifty policies which had not yet been published were “pulled back” pending review by the new executive team. On January 11, 2019, we requested that we be provided those documents. On January 11, 2019, that commander responded to our request by stating that the policies were “somewhere” within the review process and were going through a new review process.

We were also informed that two policies, one on the use of Tasers and the other on carrying a weapon while under the influence of alcohol, which had been in the review process prior to the election, had not been published. The Office of Inspector General had been in discussion with the Department on both of those policies and had been advised by the prior administration that the policy on carrying a weapon while under the influence of alcohol had been approved by the prior Sheriff.

During the week of January 14, 2019, we were provided copies of nine proposed new or revised Field Operations Directives. It appeared that two of these had been issued subsequent to our December 4, 2018, request to the Sheriff. We were also provided with thirty-three proposals to change policies affecting approximately ninety-four sections of the Manual of Policies and Procedures. Some of these policy proposals were routine revisions to account for changes in the names of divisions or units, provide for gender inclusive language or effectuate changes in administrative procedures and practices.

However, some of these policy changes directly impacted and diminished efforts by the Department to address the cultural issues within the Department conducive to abuse which had been identified by the CCJV. The CCJV found that there was a “problematic organizational culture” within the Departmentⁱⁱⁱ which “also has failed to address with appropriate rigor the ‘code of silence’” and “rarely finds or meaningfully punishes dishonesty.”^{iv} As part of this culture, the CCJV observed that senior LASD officials have undermined the discipline system.^v

Two policies were developed to address this issue.

MPP 3-01/030.14 **Management Decisions** had already been implemented by the Department. This prohibited department executives from undermining lawful decisions of the Department and from intervening in matters which were outside of the intervening executive’s responsibility.

Although Sheriff Villanueva publicly stated that he was re-evaluating disciplinary decisions because department executives were improperly intervening in those decisions, in what may have been one of the first policy revisions by the Department, he rescinded this policy. The copy of this, one of the thirty-three proposed policy changes provided to the Office of Inspector General by the Department the week of January 14, 2019, reflects that the policy revision was submitted subsequent to the Sheriff’s inauguration and approved by the Sheriff on January 8, 2019. The Sheriff did not provide a copy of this revision when originally asked and the Sheriff implemented this policy without advising the Office of Inspector General.

MPP 3-01/030.12 **Conflict of Interest and Investigative Recusals** had not yet been adopted but had been prepared at the direction of Undersheriff Jacques A. La Berge and reviewed and revised by the Chief of Professional Standards and Training Division (now the Professional Standards Division, PSD). This policy required internal investigators to remain neutral in their investigations, avoid conflicts of interest and recuse themselves as investigators in cases involving family members or persons with whom they had close relationships. This policy, to date, has not been enacted by the Sheriff.

Additionally, the Department has removed the Internal Criminal Investigations Bureau from the PSD, reversing an organizational change implemented in response to a recommendation by the CCJV. The CCJV observed that the Department’s Internal Criminal Investigations Bureau reported directly to the Undersheriff, who was then Paul Tanaka. Both Paul Tanaka and the Captain of the Internal Criminal Investigations Bureau, who reported to Tanaka, were convicted and imprisoned for their roles in impeding the investigation of the Federal Bureau of Investigation into jail violence.

The CCJC recommended that the Internal Criminal Investigations Bureau and the Internal Affairs Bureau be placed into one division under the command of a chief who reported directly to the Sheriff. The Internal Affairs Bureau and the Internal Criminal Investigations Bureau were both placed in the same division, which became the Professional Standards Division. However, the Internal Criminal

Investigations Bureau has been removed from the Professional Standards Division and reports again to the Sheriff and the Undersheriff.^{vi}

The Office of Inspector General was not provided with these proposed changes or advised when these policies were issued.

The CCJV recommended that the Department address the code of silence and discipline by revising the discipline guidelines to establish increased penalties for excessive force and dishonesty. To implement this recommendation the Department twice revised its Guidelines for Discipline.

On December 12, 2019, Sheriff Villanueva decided not to object to the decision by the Employee Relations Commission hearing officer that the Department should have met and conferred with the deputies' union before implementing these revisions. He agreed to revoke the revised Guidelines for Discipline which mandated dismissal for employees who were found to have been dishonest or made false statements to investigators and reinstate the 2012 Guidelines, which do not mandate termination for those employees for those violations and which had been the subject of CCJV criticism.

The Department did not advise the Office of Inspector General that this change was contemplated or that it had been implemented.

THE DEPARTMENT HAS BARRED THE OFFICE OF INSPECTOR GENERAL'S PRESENCE AT THE EXECUTIVE PLANNING COUNCIL MEETINGS

On April 5, 2019, the Sheriff barred the Inspector General and his staff from future meetings of the Executive Planning Council.

At these meetings significant proposed policies, procedures and practices are discussed. Executives are informed of changes and provided direction on how policies, procedures and practices are to be implemented. At these meetings the executives provide feedback to the Sheriff on the successes and failures of Department operations and the effectiveness of the Department's policies, practices and procedures. As noted above, it was at meetings of the Executive Planning Council that the Office of Inspector General learned of the Department's actions regarding policies that had not been disclosed to the Office of Inspector General.

On March 29, 2019, we provided the Department with a submission draft of our first report back to the Board of Supervisors on our monitoring of LASD internal administrative investigations. In that draft (and our subsequent public report) we reported that we were told that a Department directive had been issued that all chiefs, commanders and captains were to re-evaluate open administrative investigations to determine whether any of them should be inactivated. We first learned of this directive at an EPC meeting. The following Friday the Sheriff notified the Interim Inspector General that the Office of Inspector General could no longer attend EPC meetings.

THE DEPARTMENT HAS DENIED THE OFFICE OF INSPECTOR GENERAL ACCESS TO HIRING RECORDS OF DEPUTY CANDIDATES

The Department denied requests by the Office of Inspector General to review the hiring packets of candidates for deputy positions.

The actions and public statements of the Sheriff have caused concern that perhaps the Department's hiring standards have been relaxed in order to increase the applicant pool of candidates, resulting in the hiring of less qualified candidates to deputy positions.

On July 19, the Los Angeles Times reported that the Sheriff said that previously applicants were rejected for positive polygraph results related to, among other matters, domestic violence. He reportedly suggested that a polygraph result could be the result of the applicant being a victim of domestic violence. He stated that investigators should follow up to find out the details of such a domestic violence incident rather than reject an applicant.

The Department reports that the time from application to hiring has been drastically reduced. Based upon the manner in which the "Truth and Reconciliation Panel" was conducted, the Sheriff's public statements that the reinstatement of employees who had been terminated was necessary to attract more candidates, and that domestic violence by deputies should not be the subject of an administrative investigation unless there is a criminal case filed, we are concerned that the reduction in time will result in scaling back protections against hiring people unqualified for the honor of being a deputy sheriff.

On May 22, 2019, we first requested to review the hiring packets of candidates for deputy positions. The Department denied that request. On June 17, 2019, the Inspector General, in a face-to-face meeting with the Sheriff, asked the Sheriff to authorize the review of those hiring packets. The Department denied us access to the hiring packets and invited us instead to meet and allow the Department to share what the Department considers to be hiring improvements.

CONCLUSION

In spite of the Inspector General's requests and public statements by the Sheriff to the contrary, access by the Office of Inspector General to information regarding the development, implementation and enforcement of key Department policies has been delayed, hindered, ignored and in some cases denied outright. This failure to comply with County Code section 6.144.90 has significantly impaired the ability of the Office of Inspector General to monitor the Sheriff's Department's operations and report publicly on its findings. In the past such secrecy has resulted in a Sheriff misusing law enforcement powers in an effort to stifle critics through intimidation of an outside agency investigating the Department.

ⁱ MPP 2-10/040.00 states that the Performance Recording and Monitoring System is the Department's "integrated database for administrative investigations and service comment forms. It also includes a system to flag instances that meet predefined criteria and thresholds. PRMS was originally comprised of three modules that automated the business processes of Internal Affairs Bureau, Civil Litigation, and Pitchess Motions. PRMS consolidates the information kept in these independent databases into an integrated database that serves as a Department-wide decision support system in matters related to risk management and service reviews."

ⁱⁱ [Initial Implementation by the Los Angeles County Sheriff's Department of the Truth and Reconciliation Process, July 2019.](#)

ⁱⁱⁱ Report of the Citizens' Commission on Jail Violence, September 2012, Executive Summary, page 11.

^{iv} Report of the Citizens' Commission on Jail Violence, September 2012, p. 95.

^v Report of the Citizens' Commission on Jail Violence, September 2012, Executive Summary, p. 14.

^{vi} The Manual of Policies and Procedures has been updated to reflect this change. However, the revision history for sections 2.04/010.00 do not reflect that the change is a policy revision. Because we have been excluded from the process we do not know if this is an oversight. However, archival organization charts reflect that as recently as March 20, 2019, the Internal Criminal Investigations Bureau reported to the Chief of the Professional Standards Division.